

UNITED STATES OF AMERICA
Before the
SECURITIES AND EXCHANGE COMMISSION

SECURITIES EXCHANGE ACT OF 1934

Release No. 56411 / September 13, 2007

ACCOUNTING AND AUDITING ENFORCEMENT

Release No. 2691/ September 13, 2007

ADMINISTRATIVE PROCEEDING

File No. 3-12772

In the Matter of

**F. X. Duffy & Co., Inc. and
Kevin Patrick Duffy, CPA,**

Respondents.

**ORDER INSTITUTING PUBLIC
ADMINISTRATIVE AND CEASE-AND-
DESIST PROCEEDINGS PURSUANT TO
SECTIONS 4C AND 21C OF THE
SECURITIES EXCHANGE ACT OF 1934
AND RULE 102(e) OF THE
COMMISSION'S RULES OF PRACTICE,
MAKING FINDINGS, AND IMPOSING
REMEDIAL SANCTIONS AND A CEASE-
AND-DESIST ORDER**

I.

The Securities and Exchange Commission ("Commission") deems it appropriate that cease-and-desist proceedings be, and hereby are, instituted against F. X. Duffy & Co., Inc. and Kevin Patrick Duffy, CPA (collectively "Respondents") pursuant to Section 21C of the Securities Exchange Act of 1934 ("Exchange Act"), and that public administrative proceedings be, and hereby are, instituted against F. X. Duffy & Co., Inc. pursuant to Section 4C¹ of the Exchange Act and Rule 102(e)(1)(iii) of the Commission's Rules of Practice.²

¹ Section 4C provides, in relevant part, that:

The Commission may censure any person, or deny, temporarily or permanently, to any person the privilege of appearing or practicing before the Commission in any way, if that person is found . . . to have willfully violated, or willfully aided and abetted the violation of, any provision of the securities laws or the rules and regulations thereunder.

² Rule 102(e)(1)(iii) provides, in relevant part, that:

The Commission may censure a person or deny, temporarily or permanently, the privilege of appearing or practicing before it in any way to any person who is found . . . to have willfully violated, or willfully aided and abetted the violation of any provision of the Federal securities laws or the rules and regulations thereunder.

II.

In anticipation of the institution of these proceedings, Respondents have submitted an Offer of Settlement (“Offer”), which the Commission has determined to accept. Solely for the purpose of these proceedings and any other proceedings brought by or on behalf of the Commission, or to which the Commission is a party, and without admitting or denying the findings herein, except as to the Commission’s jurisdiction over them and the subject matter of these proceedings, which are admitted, Respondents consent to the entry of this Order Instituting Public Administrative and Cease-and-Desist Proceedings Pursuant to Sections 4C and 21C of the Securities Exchange Act of 1934 and Rule 102(e) of the Commission’s Rules of Practice, Making Findings, and Imposing Remedial Sanctions and a Cease-and-Desist Order (“Order”), as set forth below.

III.

On the basis of this Order and Respondents’ Offer, the Commission finds³ that:

A. RESPONDENTS

1. F. X. Duffy & Co., Inc. (the “Firm”) is a Pennsylvania corporation and accounting firm headquartered in Philadelphia, Pennsylvania. The Firm audited Sentry Builders Corp.’s (“Sentry Builders”) financial statements for the company’s 2003 and 2004 fiscal years ended July 31, 2003 and 2004, respectively.

2. Kevin Patrick Duffy, CPA, (“Duffy”), 40, of Philadelphia, Pennsylvania, is a certified public accountant licensed in the state of Pennsylvania since 1992. Duffy was the engagement partner in connection with the Firm’s audit of Sentry Builders’ financial statements for the company’s 2003 and 2004 fiscal years.

B. FACTS

1. Sentry Builders is a Delaware corporation with its headquarters in Huntington, New York. During the relevant period, Sentry Builders’ common stock was registered with the Commission pursuant to Section 12(g) of the Exchange Act. For its fiscal year ended July 31, 2003, Sentry Builders reported no revenues and no assets.

2. Sentry Builders has at all relevant times been an issuer as defined by the Sarbanes-Oxley Act of 2002 (the “Act”).

3. The Firm audited Sentry Builders’ 2003 and 2004 financial statements included in Sentry Builders’ annual report for fiscal years 2003 and 2004, respectively, on Form 10-K, both filed with the Commission on August 5, 2004. As part of the audits, the Firm prepared and issued two separate audit reports dated June 18, 2004 (the “Sentry Builders audit reports”), which the company included in its 2003 and 2004 Form 10-Ks.

³ The findings herein are made pursuant to Respondents’ Offer of Settlement and are not binding on any other person or entity in this or any other proceeding.

